

**AFFIDAVIT**

Before the undersigned United States Magistrate Judge, Fargo, ND, the undersigned complainant, being first duly sworn, states:

## Count 1

## 18 U.S.C. 2251(d)(1) - Sexual Exploitation of Children

In or about July 2015, in the State and Federal District of North Dakota, Simon RILEY knowingly made, printed, published, and caused to be made, printed, and published a notice and advertisement seeking and offering to receive, exchange, produce, distribute, and reproduce a visual depiction the production of which involved the use of a minor engaging in sexually explicit conduct and which depiction is of such conduct and Riley knew or had reason to know that such notice or advertisement was transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer

In violation of Title 18, United States Code, Section 2251 (d)(1).

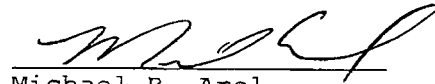
Complainant, as a Federal Agent with the Department of Homeland Security, HSI, states the following as and for probable cause:

1. Your Affiant is a Special Agent with the Department of Homeland Security, HSI, currently assigned to the Resident Agent in Charge, Grand Forks, ND.
2. Your Affiant has had formal training in the investigation of various types of criminal activity, and has conducted investigations into various types of criminal activity, to include child exploitation investigations.
3. This affidavit is based upon information developed through investigation by your Affiant, as well as information provided to your Affiant by other law enforcement officers.
4. In July 2015, Interpol identified a website, identified as "The Pedo Giftbox" on the Tor Network(The Onion Rounter) which contained images of child pornography which had been posted by various users.
5. According to Interpol, one such user, identified as "skittleman8," is responsible for posting images depicting children engaged in sexually conduct as well as sexually suggestive poses.

6. In addition to posting sexually explicit images of children, "skittleman8" posted a "how to" guide on the website that directed individuals how to pose as females on various social media sites and coerce young girls into providing naked images and videos of themselves.
7. Interpol was able to tentatively identify multiple victims who had their images posted on "The Pedo Giftbox" website. These identifications were based upon contextual clues in the background of the images and videos. One such victim depicted in the images on the website "The Pedo Giftbox" was tentatively identified by law enforcement as A.G., a 13-year-old female living in Fargo, North Dakota.
8. On August 25, 2015, your Affiant and North Dakota Bureau of Criminal Investigation Special Agent Jesse Smith interviewed A.G. who reported that she met an individual on the social media site Omegle, and soon thereafter began communicating with this individual through Kik Messenger. Kik Messenger is a mobile application that is used by users for the purpose of exchanging texts as well as digital images. A.G. stated that this individual used the Kik screen name "bubblytracie." A.G. further stated that the user utilizing the screen name "bubblytracie" purported to be a female. A.G. stated that she sent "bubblytracie" sexually explicit images of herself, believing this person to be a female. A.G. also stated that she told the user "bubblytracie" that she was 13 years of age.
9. A.G. stated that eventually the user "bubblytracie" told her that in actuality, he was a male. A.G. said she continued to send the user "bubblytracie" additional sexually explicit images and videos of herself. A.G. also stated that the user "bubblytracie" told her that he posted them to a website. According to A.G., the user "bubblytracie" sent her screen shots of the site to which he posted the images. A.G. stated that she saw the username "skittleman" on the screen shot of the website. A.G. further stated that the Kik Messenger user "bubblytracie" told her that he was "skittleman."
10. A.G. stated that the user identified as "bubblytracie" described to her how he posed as a girl online in order to coerce girls into sending him sexually explicit images. A.G. also stated that the user "bubblytracie" told her that he had done this to other girls as young as ten (10) years old.
11. A.G. and her mother provided consent to your Affiant and SA Smith to take over A.G.'s Kik account and assume A.G.'s identity in an attempt to identify the user(s) "skittleman" and "bubblytracie." Upon signing into A.G.'s Kik account, A.G. pointed out to your Affiant and SA Smith that "bubblytracie" had changed his Kik user name to "ohshitItsTracie."

12. On August 28, 2015, your Affiant issued a DHS Summons to Kik for subscriber information, to include login IP addresses for the Kik accounts "bubblytracie" and "ohshitItsTracie." On August 31, 2015, Kik provided a response to the aforementioned summons. Based upon login IP logs provided by Kik, it appeared the user of the accounts were the same individual, and that the login IP addresses originated in the United Kingdom.
13. Information regarding the Kik accounts, including the login IP addresses, was forwarded to the National Crime Agency in the United Kingdom. The National Crime Agency was able to determine at least some of the IP addresses logging into the Kik accounts originated from a residence in the United Kingdom. Based upon this information, United Kingdom law enforcement executed a search warrant at a residence located at 25 Beverly Gardens, Swansea SA5 5LB, United Kingdom, on September 10, 2015. Based upon the above-referenced IP logs, it was believed that the user of the target Kik accounts was residing at that residence.
14. According to UK law enforcement, Simon Riley was residing at the above-described address with his parents. Found in his bedroom, which was locked, were a rubber doll in the form of a child and various electronic media. An initial forensic triage of RILEY's computer revealed approximately 1800 files of child pornography that included sexual penetration of children. Also found in Riley's room were post-it notes with login information for the "ohshitItsTracie" and "skittleman8" accounts.
15. According to UK law enforcement, Simon RILEY was not present at the time of the search warrant, and information obtained since reveals that RILEY is currently in the United States vacationing in the Orlando, Florida area.
16. Your Affiant has verified RILEY has entered the United States and is currently located in the Orlando, Florida area.
17. Your Affiant has reviewed images sent from A.G. to RILEY, and which RILEY has posted to the site "The Pedo Giftbox." The images include sexually explicit images in which A.G. is naked, and in which the focal point of the image is A.G.'s genitals. Additionally, there are images, which were sent to RILEY by A.G., and which were posted on the site, in which A.G. is naked and inserting her fingers in her vagina. In one of the images, A.G. is holding a sign that says June 6, 2015.
18. Your Affiant and SA Smith logged on the site "The Pedo Giftbox" and located images of A.G., including the above-described images. The site reflects that the images have been accessed and viewed by users more than 20,000 times. The posting date on the site

indicated that at least some of the files were posted and made available on July 21, 2015.



Michael R. Arel  
Special Agent  
Department of Homeland  
Security - HSI

SUBSCRIBED and SWORN before me *via telephone*  
On this 11<sup>th</sup> day of September, 2015.



Alice R. Senechal  
United States Magistrate Judge